

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

Brian Baude,)	
)	
Plaintiff,)	
)	Cause No. 4:18-CV-1564
v.)	
)	
City of St. Louis, <i>et al.</i>)	
)	
Defendants.)	
)	

**DEFENDANTS' CONSENT MOTION FOR
EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

COME NOW Defendants City of St. Louis, Col. Gerald Leyshock, Lt. Scott Boyher, Lt. Timothy Sachs, Sgt. Randy Jemerson, Sgt. Matthew Karnowski, Sgt. Brian Rossomanno, by and through their undersigned counsel, and hereby move the Court to grant them an extension of time of thirty (30) days, until and including December 19, 2018, to answer or otherwise respond to Plaintiff's Complaint. In support of their motion, Defendants state as follows:

1. Plaintiff filed this action on September 17, 2018, and requested Defendants to waive service the following day.
2. Counsel for Defendants has entered and waived service on their behalf.
3. Having waived service, Defendants' response to Plaintiff's complaint is due on November 19, 2018.
4. Plaintiff's complaint alleges the police violated his civil rights in responding to protests that occurred in the wake of the Stockley verdict in September 2017. Plaintiff's lawsuit is one of fourteen lawsuits filed by Plaintiff's attorneys against

the City and various police officers on September 17, 2018. *See Alston v. City of St. Louis, et al.*, 4:18-CV-1569-SPM; *Davis v. City of St. Louis, et al.*, 4:18-CV-1574-HEA; *Dreith v. City of St. Louis, et al.*, 4:18-CV-1565-PL; *Gullet v. City of St. Louis, et al.*, 4:18-CV-1571-JCH; *Laird, et al. v. City of St. Louis, et al.*, 4:18-CV-1567-AGF; *Laney v. City of St. Louis, et al.*, 4:18-CV-1575-CDP; *Nelson, et al. v. City of St. Louis, et al.*, 4:18-CV-1561-SPM; *Newbold v. City of St. Louis, et al.*, 4:18-CV-1572-HEA; *Ortega v. City of St. Louis, et al.*, 4:18-CV-1576-DDN; *Robertson v. City of St. Louis, et al.*, 4:18-CV-1570-JAR; *Rose v. City of St. Louis, et al.*, 4:18-CV-1568-RLW; *Thomas v. City of St. Louis, et al.*, 4:18-CV-1566-JAR; *Ziegler v. City of St. Louis, et al.*, 4:18-CV-1577-SPM.

5. Since filing fourteen lawsuits on September 17, 2018, Plaintiff's attorneys have filed seven additional lawsuits stemming from alleged police misconduct during the Stockley protests. *See Aldridge v. City of St. Louis, et al.*, 4:18-CV-1677-CAS; *Brandy v. City of St. Louis, et al.*, 4:18-CV-1674-JCH; *Brown, Crystal v. City of St. Louis, et al.*, 4:18-CV-1676-JMB; *De Mian v. City of St. Louis, et al.*, 4:18-CV-1680-AGF; *Gray v. City of St. Louis, et al.*, 4:18-CV-1678-NAB; *Green v. City of St. Louis*, 4:18-CV-1629-HEA; *Kennedy v. City of St. Louis, et al.*, 4:18-CV-1679-JCH.

6. Due to the press of business, including the number of lawsuits and claims filed against the City and its police officers by Plaintiff's attorneys in the last sixty days, Defendants require an extension of time of thirty (30) days, until and including December 19, 2018, to respond to Plaintiff's complaint.

7. Counsel for Defendants has communicated with counsel for Plaintiff, and counsel for Plaintiff has indicated that Plaintiff consents to the relief requested in this motion.

WHEREFORE, Defendants respectfully request the Court to grant them an extension of time of thirty (30) days, until and including December 19, 2018, to respond to Plaintiff's complaint, and for any such other and further relief the Court deems fair and appropriate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify this Request was electronically filed on November 19, 2018 with the Court for service by means of Notice of Electronic Filing upon all attorneys of record.

/s/ Erin K. McGowan